Steven M. Abramowitz (No. 043641990)

VINSON & ELKINS LLP

1114 Avenue of the Americas, 32nd Floor

New York, NY 10036 Telephone: (212) 237-0137 Facsimile: (917) 849-5381

Email: sabramowitz@velaw.com

Local Counsel for Cyprus Amax Minerals Company

Paul E. Heath

VINSON & ELKINS LLP

845 Texas Avenue, Suite 4700 Houston, Texas 77002 Telephone: (713) 758-3313 Facsimile: (713) 615-5056 pheath@velaw.com

-and-

Matthew W. Moran Katherine Drell Grissel

VINSON & ELKINS LLP

2001 Ross Avenue, Suite 3900

Dallas, Texas 75201

Telephone: (214) 220-7700 Facsimile: (214) 220-7716 mmoran@velaw.com kgrissel@velaw.com

Co-Counsel for Cyprus Amax Minerals Company

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In re:	:	Chapter 11
	:	
LTL MANAGEMENT LLC,1	:	Case No. 23-12825
	:	
Debtor.	:	
	:	

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

APPLICATION FOR ADMISSION PRO HAC VICE OF MATTHEW W. MORAN

- I, Steven M. Abramowitz, am a partner with the law firm Vinson & Elkins LLP and am a member in good standing of the bar of this Court. My New Jersey attorney registration number is 043641990. Pursuant to Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Procedure for the District of New Jersey (the "Local Bankruptcy Rules"), I move for the *pro hac vice* admission of Matthew W. Moran to practice in this Court for the purpose of representing Cyprus Amax Minerals Company as an interested party, in the above-captioned case. In support of this Application, the undersigned respectfully represents to the Court as follows:
- 1. Mr. Moran is a partner of the law firm of Vinson & Elkins LLP, with his office located at 2001 Ross Avenue, Suite 3900, Dallas, Texas 75201. Mr. Moran's telephone number is (214) 220-7723, and his facsimile number is (214) 999-7723. Mr. Moran's e-mail address is mmoran@velaw.com.
- 2. As stated in the *Certified Statement of Matthew W. Moran in Support of Application for Admission* Pro Hac Vice, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Moran has been a member in good standing of the State Bar of Texas since 1997 and is admitted to practice in the United States Supreme Court, the United States Courts of Appeals for the Federal, Fifth, and Eleventh Circuits, as well as the United States District Courts for the Northern, Eastern, Southern, and Western Districts of Texas. Further, as set forth in his Certified Statement, Mr. Moran is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.
- 4. With reference to all matters incident to this case, Mr. Moran submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the District of New Jersey for any alleged misconduct that occurs in the course of this chapter 11 case.

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Matthew W. Moran to appear before the Court pro hac vice in this case.

Date: May 24, 2023 /s/ Steven M. Abramowitz

Steven M. Abramowitz VINSON & ELKINS LLP 1114 Avenue of the Americans, 32nd Floor New York, NY 10036

Telephone: (212) 237-1037 Fax: (917) 849-5381

Email: sabramowitz@velaw.com

Local Counsel for Cyprus Amax Minerals Company